

ANTI-DISCRIMINATION CENTER, INC.

"One Community, No Exclusion"

March 8, 2021

Hon. Laura Taylor Swain
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Summary judgment briefing now complete; link available
Noel and Senat v. City of New York, 15-CV-5236 (LTS) (KHP)

Your Honor:

With the filings by plaintiffs made earlier today (ECF 946 - ECF 949), briefing in connection with plaintiffs' motion for partial summary judgment and defendant's cross-motion for summary judgment is now complete.

A link to copies of all papers¹ will be forwarded to Chambers along with a courtesy copy of this letter.

On the following pages, I provide a listing of the filings.

Respectfully submitted,

Craig Gurian

Craig Gurian
Co-Counsel for Plaintiffs

¹ In two cases, redacted filings had been supplanted by non-redacted filings. Only the non-redacted filings are being referenced or provided.

Listing of filings

This listing is organized in seven sections, the first six relating to the cross-motions, and the seventh relating to defendant's motion to exclude Professor Orfield. It corresponds to the folders and files contained within those folders found at the link provided.

The sixth section represents the papers filed today.

When one clicks on the link provided, selects "download all," downloads the zipped file, and then expands that file, the folders will appear in numerical order if the downloads folder is sorted by name.

1. P motion for partial SJ

1A	ECF 881	P notice of motion
1B	ECF 881-1	P 56.1 statement ("P56.1")
1C	ECF 882	P memorandum of law ("PI Brief")
1D	ECF 883	Beveridge declaration, part 1 – declaration & exhibits ("BD")
1E	ECF 884	Beveridge declaration, part 2 – sources and methodology appendix
1F	ECF 885	Gurian declaration

2. D opp to P motion, D cross-motion for SJ

2A	ECF 896	D notice of cross-motion
2B	ECF 897	Siskin declaration ("SD")
2C	ECF 898	Goetz declaration ("Goetz Aug. 2020 Dec")
2D	ECF 899	Been declaration ("Been Aug. 2020 Dec")
2E	ECF 900	Brown declaration
2F	ECF 901	D responses and objections to P56.1 statement ("P56.1DR")
2G	ECF 902	D memorandum of law ("DOX Brief")
2H	ECF 903	Polifione declaration, part 1, with exhibits
2I	ECF 904	D 56.1 statement ("D56.1")
2J	ECF 905	Polifione declaration, part 2 (exhibits found in Item 2K)
2K	ECF 905-1 to 905-26	Exhibits to Polifione declaration, part 2

3. P reply to D opp; P opp to D cross-motion

3A	ECF 928	P memorandum of law, unredacted per ECF 926 order ("PRO Brief")
3B	ECF 913	Orfield declaration ("Orfield Oct. 2020 Dec")
3C	ECF 914	Beveridge declaration ("BROD")
3D	ECF 915	Gurian legislative materials declaration ("Gurian LM Dec")
3E	ECF 917	P objections and responses to D56.1 statement ("D56.1PR")
3F	ECF 927	Maldonado declaration, unredacted per ECF 926 order ("MD")

4. Lawyers' Committee *amicus*

4A	ECF 935	Lawyer's Committee <i>Amicus</i> ("LC Brief")
----	---------	---

(continued next page)

5. D reply to P opp to D cross-motion

5A	ECF 939	Siskin declaration (“SD 2021”)
5B	ECF 940	Goetz declaration (“EG 2021”)
5C	ECF 941	D memorandum of law (“DREP Brief”)
5D	ECF 943	Polifione declaration

6. P sur-reply

6A	ECF 946	Maldonado declaration (“MD 2021”)
6B	ECF 947	Krysan declaration (“MK”)
6C	ECF 948	Beveridge declaration (“BD 2021”)
6D	ECF 949	P memorandum of law in sur-reply (“PS Brief”)

7. D motion to exclude Professor Orfield

7A	ECF 893	D notice of motion to exclude Professor Orfield
7B	ECF 894	Dalal declaration in support
7C	ECF 895	D memorandum of law in support
7D	ECF 920	P memorandum of law in opposition
7E	ECF 921	Gregorio declaration in opposition
7F	ECF 942	D reply memorandum of law in support